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Before the
MASSACHUSETTS DEPARTMENT
OF TELECOMMUNICATIONS AND ENERGY
Boston, Massachusetts 02110

NANPA, on behalf of the Massachusetts
Telecommunications Industry,

Petition for Approval of Numbering Plan Area Relief Planning for the 413 Area Code

D. T. E. _____

PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE MASSACHUSETTS TELECOMMUNICATIONS INDUSTRY

NeuStar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA") and acting on behalf of the Massachusetts telecommunications industry (the "Industry"), (1) petitions the Massachusetts Department of Telecommunications and Energy ("Department") for approval of an all-services distributed overlay relief plan for the 413 Numbering Plan Area ("NPA"). (2) The Industry reached consensus to recommend the all-services distributed overlay relief plan to the Department at an Industry relief planning meeting held on June 20, 2000. The projections set forth in the 2000 COCUS and NPA Exhaust Analysis indicate that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) in the 413 NPA will exhaust during the first quarter of 2002. (3) In support thereof, NANPA submits the following:

I. BACKGROUND

Based upon the projected exhaust date and pursuant to Industry guidelines, (4) NANPA facilitated an Industry meeting in Holyoke, Massachusetts, on June 20, 2000, to review and discuss relief alternatives for the 413 NPA. (5) Pursuant to the NPA Relief Planning Guidelines, NANPA distributed to Industry members an Initial Planning Document ("IPD"). (6) The IPD set forth three relief proposals, an all-services distributed overlay and two geographic split alternatives. (7) The geographic split alternatives differed as to where the boundary line was placed. No additional alternatives were presented at the meeting.

Following extensive discussion regarding attributes of geographic splits and overlays, the Industry reached consensus to recommend to the Department Alternative #1, an all-services distributed overlay, as the preferred form of relief for the 413 NPA. Industry members preferred Alternative #1 over the split alternatives for the

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following reasons: (1) Alternative #1 provides a consistent dialing plan throughout Massachusetts; (2) the overlay will not divide communities of interest; (3) cellular carriers would not incur additional costs resulting from the manual reprogramming of large quantities of handsets; and (5) customers would not be required to change their telephone numbers. For these reasons, the Industry reached consensus to submit Alternative #1 to the Department for approval.

II. DESCRIPTION OF THE PROPOSED ALL-SERVICES DISTRIBUTED OVERLAY RELIEF PLAN

Alternative #1 would overlay a new area code on the same geographic area covered by the existing 413 NPA. Consistent with the Federal Communications Commission's regulations, the Industry reached consensus to implement a ten-digit local dialing plan for calls placed both within and between the existing NPA and the overlay NPA. (8) The Industry also reached consensus to allow customers, at their election, to dial 1+10 digits for all local calls. The projected life for Alternative #1 is five years.

The Industry recommends that the Department approve what it considers an "ideal" implementation schedule consisting of a six-month network preparation period followed by a twelve month permissive dialing period during which customers may dial seven or ten or 1+10 digits for local calls. CO codes will be available in the new NPA one month after the end of the

permissive dialing period. This implementation schedule is based upon a relief order issued prior to the end of September 2000.

III. CONCLUSION

For the foregoing reasons, NANPA, on behalf of the Industry, respectfully requests that the Department implement an all-services distributed overlay as the means of relief for the 413 NPA. The Industry also requests that the Department adopt its recommended implementation schedule.

Respectfully submitted,

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1.

1 The Industry is composed of current and prospective telecommunications carriers operating in or considering operations within the 413 area code of Massachusetts.

2.

2 As the neutral third party administrator, NANPA has no independent view regarding the Industry's selected relief option.

3.

3 2000 COCUS and NPA Exhaust Analysis, May 23, 2000 ("2000 COCUS"). The 2000 COCUS can be accessed on NANPA's web site at <<http://www.nanpa.com>>.

4.

4 To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, Nov. 8, 1999) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry, and regulatory authorities in the planning and execution of relief efforts within a particular geographic NPA. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

5.

5 Attached as Exhibit A is a copy of the June 20, 2000 relief planning meeting minutes.

6.

6 NANPA's initial assessment of the need for relief was based upon the projected exhaust date of third quarter 2002 as set forth in the 1999 COCUS and NPA Exhaust Analysis, January 18, 2000 Update ("1999 COCUS Update"). After NANPA distributed the IPD to the Industry but prior to the relief planning meeting, NANPA released the 2000 COCUS which indicated that the projected life of the 413 NPA was shortened by two quarters to first quarter 2002. Based upon the new exhaust date, the IPD was revised and redistributed to the Industry at the relief planning meeting. Notably, one week prior to the relief planning meeting, NANPA notified the Industry that 100 CO codes had been returned to the pool of available codes increasing the number of CO codes available for assignment to 305. The return of these codes occurred too late to be incorporated into the 2000 COCUS projected exhaust date for the 413 NPA. See Attachment #4 of Exhibit A a monthly CO code assignment history for the 413 NPA.

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7 A copy of the IPD, including maps depicting each alternative, is attached as Attachment #5 to Exhibit A.

8.

8 See 47 C.F.R. § 52.19(c)(3)(ii).